

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

FLEMING STEEL COMPANY,)	Case No. 11-22292 JKF
)	
Debtor-in- Possession,)	
)	Chapter 11
)	
FLEMING STEEL COMPANY,)	Document No.: _____
)	
Movant,)	
)	
vs.)	
)	
No Respondent.)	

**MOTION TO EXTEND EXCLUSIVITY PERIOD FOR DEBTOR TO FILE
PLAN AND DISCLOSURE STATEMENT, NUNC PRO TUNC**

AND NOW, comes Fleming Steel Company (“Debtor-in-Possession”) by and through its counsel, Alan E. Cech, Esquire, and files this Motion to Extend Exclusivity Period for Debtor to file a Plan and Disclosure Statement, Nunc Pro Tunc, as follows:

1. This Motion is being brought pursuant to the provisions of 11 U.S.C. §1121 (a), (b) and (d).
2. On April 11, 2010, Fleming Steel Company (“Debtor”) filed a Voluntary Chapter 11 Bankruptcy Petition at the above docket number and since that time has been operating as a Debtor-in-Possession.
3. The Debtor is an engineering/manufacturing company which employs between 20-30 individuals.
4. Pursuant to 11 U.S.C. § 1121, the Debtor has the exclusive right to file a Plan of Reorganization and Disclosure Statement for a period of 120 days from the date of the Order for Relief. This period expired on August 9, 2011.

5. By Order dated August 17, 2011, the Debtor's exclusive right to file a Plan and Disclosure Statement was enlarged to October 10, 2011.
6. The Debtor has secured an investor and has reached agreement with its secured lender for the continued use of cash collateral, on a temporary basis. The Debtor is in the final stages of negotiation with its secured lender. Once negotiations are complete, the Debtor will be in a position to file its Plan and Disclosure Statement.
7. The Debtor anticipates that it will be able to file its Plan and Disclosure Statement within thirty (30) days and requests an extension of the exclusivity period for the Debtor to file a Plan and Disclosure Statement until November 12, 2011.
8. The Debtor is fully complying with all Chapter 11 operating guidelines and no creditors will be prejudiced by the relief requested.

WHEREFORE, Debtor respectfully requests the Court to enter an Order extending the exclusivity period for the Debtor to file a Plan and Disclosure Statement until November 12, 2011.

Date: 10/13/2011

Respectfully submitted,

MORELLA & ASSOCIATES, A
Professional Corporation

/s/Alan E. Cech
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